IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:) Chapter 11
ALPINE SUMMIT ENERGY PARTNERS,) Case No. 23-90739 (MI)
INC., et al.,) (Jointly Administered)
Debtors.	

WHITE & CASE LLP'S SECOND MONTHLY FEE STATEMENT FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JANUARY 1, 2024 TO AND INCLUDING JANUARY 31, 2024

Name of Applicant: White & Case LLP			
Applicant's Role in the Cases:	Special Litigation Counsel to the Debtors		
Employment Order:	01/22/2024 [Docket No	o. 1406]	
	Beginning of Period	End of Period	
Time period covered by this Statement:	January 1, 2024	January 31, 2024	
Summary of Total Fees and Expenses Req	uested		
Total fees requested in this Statement:		\$536,483.20 (80% of	
		\$670,604.00)	
Total reimbursable expenses requested in	this Statement	\$259.72	
Total fees and expenses requested in this Statement (exclusive		\$536,742.92	
of 20% Holdback):			
Total fees and expenses requested in this S	Statement (inclusive	\$670,863.72	
of 20% Holdback):			
Summary of Attorney Fees Requested ²			
Total attorney fees requested in this State	ment:	\$652,919.00	
Total actual attorney hours covered by the	is Statement:	597.0	
Average hourly rate for attorneys:		\$1,094	
Summary of Paraprofessional Fees Reque	sted ³		
Total paraprofessional fees requested in the	his Statement:	\$17,685.00	
Total actual paraprofessional hours cover	ed by this Statement:	39.3	
Average hourly rate for paraprofessionals	•	\$450	

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Alpine Summit Energy Partners, Inc. (3755), HB2 Origination, LLC (6760), Ageron Energy II, LLC (1436), Ironroc Energy Partners, LLC (9801), Ageron Ironroc Energy, LLC (N/A), Alpine Summit Energy Investors, Inc. (4428), and Alpine Carbon, LLC (N/A). The location of the Debtors' service address is: 3322 West End Ave, Suite 450, Nashville, TN 37203.

² Includes staff attorneys, if any.

May include individuals who are admitted to the bar.

In accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals ("Compensation Procedures Order") [Docket No. 677], each Application Recipient (as defined therein) receiving notice of the Monthly Statement will have until 4:00 p.m. (prevailing Central Time) 14 days after the filing of the Monthly Statement to object to the requested fees and expenses. Upon the expiration of such period, the Debtors are authorized to pay White & Case an amount equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Statement that are not objected to.

White & Case LLP ("White & Case"), special litigation counsel for the debtors and debtors in possession (the "Debtors") in the above-captioned chapter 11 cases, hereby files this monthly statement (this "Monthly Statement") for the period from January 1, 2024 to and including January 31, 2024 (the "Fee Period") requesting an aggregate amount of \$536,742.92 for the Fee Period representing (a) interim allowance and payment of compensation for professional services to the Debtors in the amount of \$536,483.20, representing 80% of the \$670,604.00 of fees earned by White & Case for professional services to the Debtors during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Fee Period in connection with such services in the amount of \$259.72.

- 1. Prior to filing this Monthly Statement, White & Case reviewed its fees worked (which totaled 682.1 hours and \$707,159.50) and expenses incurred (which totaled \$259.72). Following that review, White & Case voluntarily elected to reduce its fees by 45.8 hours (~6.7%) and \$36,555.50 (~5.2%) prior to filing this Monthly Statement. White & Case will not hereafter seek payment for the fees that it has voluntarily reduced.
- 2. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by timekeeper (attorneys and paraprofessionals) is attached hereto as **Exhibit A**. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by category is attached hereto as **Exhibit B**. A detailed statement of White & Case's hours expended and fees earned during the Fee Period is attached hereto as **Exhibit C**. A summary and detailed

statement of White & Case's expenses incurred for which reimbursement is sought is attached hereto as **Exhibit D**.

- 3. White & Case attorneys and paraprofessionals expended a total of 636.3 hours in connection with the chapter 11 cases during the Fee Period for which compensation is sought pursuant to this Monthly Statement. All services rendered by White & Case for which compensation is sought pursuant to this Monthly Statement were rendered solely to or on behalf of the Debtors. No payments were received by White & Case from any source other than the Debtors for services rendered or to be rendered in connection with the chapter 11 cases.
- 4. Pursuant to the Compensation Procedures Order, any party objecting to this Monthly Statement shall serve via email to White & Case and each of the Application Recipients (defined in the Compensation Procedures Order) a written notice setting forth with reasonable detail the nature of the objection and the amount at issue (the "Notice of Objection") on or before 4:00 p.m. (prevailing Central Time) on the fourteenth (14) day after service of this Monthly Statement.
- 5. Upon expiration of the objection deadline, if no Notice of Objection is timely served, the Debtors are authorized to pay White & Case an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Statement that are not subject to an objection. If a Notice of Objection is timely served pursuant to the Compensation Procedures Order, the objecting party and White & Case shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay White & Case an amount equal to 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If the parties are unable to reach an agreement, then resolution will be governed as set forth in the Compensation Procedures Order.

6. Although White & Case has made every effort to include all fees earned and expenses incurred during the Fee Period, some fees and expenses might not be included in this Monthly Statement due to delays caused by accounting and processing during the Fee Period. White & Case reserves the right to make further statements or applications to this Court for allowance of such fees and expenses not included herein. Subsequent statements or applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Compensation Procedures Order. For similar reasons, some of the fees and expenses requested herein may have been earned or incurred before the Fee Period.

Dated: February 9, 2024 Houston, Texas Respectfully Submitted,

/s/ Gregory F. Pesce

WHITE & CASE LLP

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SPECIAL LITIGATION COUNSEL TO DEBTORS AND DEBTORS IN POSSESSION

CERTIFICATE OF SERVICE

I certify that on February 9, 2024, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Gregory F. Pesce
Gregory F. Pesce

 $\underline{\textbf{Exhibit A}}$ Summary of Total Fees and Hours by Attorneys and Paraprofessionals

Name	Title	Year	Areas of Expertise	Hours	Rate	Fees
		Admitted				
Aquije, Alonso	uije, Alonso Associate 2022 Financial Restructuring & Insolvency (FRI) Practice		40.5	\$900.00	\$36,450.00	
Ash, Nikita	Associate	2021	Commercial Litigation Practice	72.6	\$1,110.00	\$80,586.00
Branson, Ariell	Associate	2023	Commercial Litigation Practice	55.7	\$900.00	\$50,130.00
Curtis, Lucas	Associate	2020	Commercial Litigation Practice	88.9	\$1,110.00	\$98,679.00
Gorsich, Ronald	Partner	2001	Financial Restructuring & Insolvency (FRI) Practice	2.3	\$1,600.00	\$3,680.00
Gundersen, Kathryn	Associate	2022	Commercial Litigation Practice	30.0	\$1,020.00	\$30,600.00
Hershey, Samuel	Partner	2013	2013 Commercial Litigation Practice		\$1,600.00	\$81,760.00
Heywood, Taylor	Associate	N/A	Pool Associates - Litigation	52.2	\$795.00	\$41,499.00
Hirshorn, Deanna	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	2.0	\$450.00	\$900.00
Koster, Charles	Partner	2009	Financial Restructuring & Insolvency (FRI) Practice	26.3	\$1,720.00	\$45,236.00
Levine, Esther	Associate	2022	Commercial Litigation Practice	81.3	\$1,020.00	\$82,926.00
Lingle, Barrett	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	27.2	\$1,160.00	\$31,552.00
Ludovici, Stephen	Associate	2014	Financial Restructuring & Insolvency (FRI) Practice	14.0	\$1,380.00	\$19,320.00
Pesce, Gregory	Partner	2011	Financial Restructuring & Insolvency (FRI) Practice	5.3	\$1,720.00	\$9,116.00
Simkins, Clint	Associate	2023	Financial Restructuring & Insolvency (FRI) Practice	31.0	\$795.00	\$24,645.00
Sutherland, Gabe	Associate	2023	Financial Restructuring & Insolvency (FRI) Practice	18.6	\$900.00	\$16,740.00
Venes, Aileen	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	18.4	\$450.00	\$8,280.00
Wick, Katie	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	18.9	\$450.00	\$8,505.00
Grand Total				636.3		\$670,604.00

Exhibit BStatement of Fees by Project Category

Cat. No.	Project Category Description	Total Hours	Total Fees
B01	Adversary Proceeding	601.8	\$628,477.00
B02	Retention/Fees	34.5	\$42,127.00
	Grand Total	636.3	\$670,604.00

Exhibit C

Time Detail

WHITE & CASE

Alpine Summit Energy Partners, Inc.\HB2 Origination, LLC\Ageron Energy II, LLC\Ironroc Energy Partners LLC\Ageron Iron & others

RE: Lawsuit filed by Alpine Summit Funding LLC in chapter 11 bankruptcy

OUR REF: 1904094-0002

For professional services for the period ending 31 January 2024

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Adversary Pr	oceeding			
1 January 2024	Telephone Huron re: amended complaint (1.0); email with internal W&C team re: motion to strike (0.5).	C Koster	1.50	2,580.00
1 January 2024	Correspond with C. Brown, E. English, N. Ash, and L. Curtis re: amended motion to dismiss and motion to strike.	S Hershey	2.20	3,520.00
1 January 2024	Research re: amended complaint (3.9); correspond with W&C team re: same (1.7).	B Lingle	5.60	6,496.00
1 January 2024	Prepare for call with Huron re: amended complaint (0.3); attend call with Huron re: same (1.0); attend call with S. Hershey, E. Levine, L. Curtis about workstreams post Huron call (0.5); review motion to enforce research (0.8); review asset ownership research (1.2); answer team queries re: amended complaint workstreams (0.5); call with A. Branson re: claims of the estate (0.2); review motion to strike research with W&C bankruptcy team (0.3); correspond with Porter Hedges (0.3); review and implement research re: amended complaint (2.4); draft research summary for S. Hershey re: same (0.7).	N Ash	8.20	9,102.00
1 January 2024	Conference with N. Ash, others re: motion to strike (1.0); conference with N. Ash and E. Levine re: same (0.5); conduct legal research re: same (2.3); conference with S. Hershey re: same (0.1); draft motion to strike (1.2); continue to draft motion to strike (3.2); conference with N. Ash re: same (0.2); conference with N. Ash, S. Hershey, and others re: same (0.6); continue to draft same (0.8).	L Curtis	9.90	10,989.00
1 January 2024	Research re: property of the estate.	K Gundersen	4.20	4,284.00
1 January 2024	Review amended complaint (0.6); discuss strategy with N. Ash re: same (0.7); draft summary for Porter Hedges re: same (0.9); call with Huron Consulting Group, S. Hershey, N. Ash, L. Curtis, and others re: strategy (0.8); draft meeting summary to send to team (0.8); research re: emergency motion (1.2); draft re: same (1.3); research re: amended motion to enforce the stay (0.8); legal research re: breach of fiduciary duty (2.8).	E Levine	9.90	10,098.00
1 January 2024	Email correspondence with W&C team re: section 362(k) research (0.4); research re: same (0.5); review amended complaint (0.7); draft motion to strike (0.3); call with B. Lingle and C. Simkins re: amended complaint (0.5); research re: pleading standards (0.6).	A Aquije	3.00	2,700.00
1 January 2024	Legal research re: bankruptcy jurisdiction in adversary proceedings (2.4); legal research re: breach of	A Branson	8.20	7,380.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	fiduciary duty and estate claims (3.0); legal research re: automatic stay (2.0); call with N. Ash re: legal research (0.3); draft and circulate summary re: legal research (0.5).			
1 January 2024	Research re: motion to dismiss.	T Heywood	3.30	2,623.50
1 January 2024	Legal research re: issues arising from amended complaint.	C Simkins	4.90	3,895.50
2 January 2024	Telephone conference with individual defendants recomplaint, schedule and motion to strike (0.7); telephone conference with internal W&C team resame (0.3); review amended complaint and attention to response (0.6); review and edit motion to strike (0.5).	C Koster	2.10	3,612.00
2 January 2024	Correspond with W&C team re: settlement issues, stay enforcement order, and related items.	G Pesce	0.40	688.00
2 January 2024	Correspond with N. Ash, C. Koster, and individual defense counsel re: amended complaint (0.7); correspond with C. Brown, N. Ash, and B. Wickers re: prepetition payments (0.9); correspond with N. Ash and A. Branson re: fiduciary duty research (0.4); review and revise motion to strike (4.1).	S Hershey	6.10	9,760.00
2 January 2024	Attend call with co-defense counsel (0.6); prepare for call with co-defense counsel (0.2); attend call with Huron (0.9); attend call with S. Hershey and A. Branson re: amended complaint (0.7); answer team queries re: amended complaint and motion to strike (1.1); review and edit motion to strike (2.6); draft motion to dismiss (0.8); review and edit amended motion to extend (0.5); attend call with S. Hershey and litigation team re: motion to strike filing (0.5); review and edit motion to seal (0.9); correspond with A. Venes and L. Curtis re: filing issues (2.3).	N Ash	11.10	12,321.00
2 January 2024	Draft motion to strike (1.6); continue to draft motion to strike (1.1); continue to draft re: same (2.1); conference with S. Hershey re: same (0.1); continue to draft re: same (2.2); incorporate edits into same (1.9); conference with H. Stamey re: same (0.2); conference with S. Hershey re: same (0.1); conference with N. Ash re: same (0.1); revise same (2.1); continue revising same (1.0); conference with S. Hershey, N. Ash, and others re: same (0.2); incorporate edits re: same (1.9).	L Curtis	14.60	16,206.00
2 January 2024	Research re: property of the estate (2.2); draft summary of research findings (2.3).	K Gundersen	4.50	4,590.00
2 January 2024	Call with C. Brown, B. Wicker, S. Hershey, N. Ash and others (1.0); call with N. Ash, S. Hershey, A. Branson, and others re: amended motion to dismiss (0.6); call with S. Hershey, N. Ash, L. Curtis, and others re: motion to strike (1.0); draft motion to extend (0.3); edit, draft and cite checking emergency motion to strike (4.9).	E Levine	7.80	7,956.00

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WHITE & CASE

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 January 2024	Draft motion seeking damages for stay violation.	A Aquije	3.40	3,060.00
2 January 2024	Legal research re: fiduciary duty claims (1.2); call with S. Hershey, N. Ash, and E. Levine re: motion to dismiss (0.5); draft motion to dismiss (3.5); draft motion to strike (1.2); call with N. Ash, E. Levine, L. Curtis, and others (W&C) re: same; draft motion to seal (1.5); review bankruptcy case protective order (0.4).	A Branson	8.30	7,470.00
2 January 2024	Research re: motion to dismiss (3.2); research re: motions to strike (2.9); research re: amended complaint (0.7); draft motion to strike (0.6); cite check re: motion to strike (2.7); call with N. Ash, L. Curtis, S. Hershey, A. Branson, and E. Levine re: motion to strike (0.2).	T Heywood	10.30	8,188.50
2 January 2024	Legal research re: issues arising from amended complaint (1.3); draft motion seeking fees (0.4).	C Simkins	1.70	1,351.50
2 January 2024	Multiple correspondence with W&C team re: assistance with emergency filing and status of draft documents/exhibits review in the adversary proceeding docket (1.5); assist team with reviewing, finalizing, efiling, and email service of redacted and unredacted versions of motion to strike and amend, and related motion to seal (4.5).	A Venes	6.00	2,700.00
2 January 2024	Update court filings folders.	K Wick	0.80	360.00
3 January 2024	Review and revise motion to strike (0.5); email correspondence with plaintiffs re: same (0.6); prepare for court hearing (0.3); legal research re: retention objection (0.4).	C Koster	1.80	3,096.00
3 January 2024	Prepare for motion to strike hearing and correspond with L. Curtis and E. Levine re: same.	S Hershey	2.60	4,160.00
3 January 2024	Coordinate filing with A. Venes, S. Hershey, and L Curtis re: exhibit issues (1.1); correspond with defense counsel re: filing (0.5); review co-counsel filing edits (0.4); draft motion to dismiss strategy in advance of litigation team call (0.4); call with litigation team re: motion to dismiss (0.4); correspondence re: motion to strike hearing preparation (0.3); review research re: motion to strike (0.8); review and revise amended exhibits re: motion to strike (0.3); call with E. Levine re: property of the estate research (0.2); review same (0.5); attend motion to strike preparation call with S. Hershey (0.7); draft motion to dismiss (2.6).	N Ash	8.20	9,102.00
3 January 2024	Incorporate edits re: motion to strike (0.1); draft correspondence to N. Ash, others re: same (0.6); draft correspondence to S. Hershey, others, re: service of same (0.3); conference call with N. Ash, others re: motion to dismiss (0.4); draft correspondence to S. Hershey, others re: service of motion to strike (0.5); conference with S. Hershey, N. Ash, others re: motion to strike (0.7); draft correspondence to S. Hershey re:	L Curtis	3.90	4,329.00

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WHITE & CASE

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	same (1.3).			
3 January 2024	Review revised complaint (1.2); meet with W&C team to discuss motion to dismiss draft (0.5); draft rider for revised motion to dismiss (2.6).	K Gundersen	4.30	4,386.00
3 January 2024	Strategy call with N. Ash, L. Curtis, A. Branson, and others re: amended motion to dismiss (0.6); strategy call with S. Hershey, N. Ash, and L. Curtis re: emergency hearing (0.8); call with A. Hovsepian (0.4); review amended motion to dismiss (1.2); review relevant motions (0.6); draft amended motion to dismiss (3.2).	E Levine	6.80	6,936.00
3 January 2024	Draft motion for damages under 362(k) and 105(a) (1.5); research re: same (1.5).	A Aquije	3.00	2,700.00
3 January 2024	Call with N. Ash, E. Levine, L. Curtis, and others (W&C) re: motion to dismiss (0.6); draft motion to dismiss re: claim against individual defendants (3.9); legal research re: pleading standards (0.8); legal research re: jurisdiction issue (1.0).	A Branson	6.30	5,670.00
3 January 2024	Revise motion to dismiss (0.8); correspond with K. Gunderson, N. Ash, A. Branson, T. Heywood, L. Curtis, and E. Levine re: motion to dismiss (0.4); research re: motion to dismiss (3.9).	T Heywood	5.10	4,054.50
3 January 2024	Draft motion seeking fees.	C Simkins	3.20	2,544.00
3 January 2024	Update main case calendar with confirmation key deadlines and hearing date.	D Hirshorn	0.50	225.00
3 January 2024	Various correspondence with team re: exhibit to sealed motion to strike (0.4); review, finalize, e-file, and serve same exhibit (0.6); update pleadings file (0.1).	A Venes	1.10	495.00
3 January 2024	Pull cases cited (0.7); download docket entries to shared drive (1.2).	K Wick	1.90	855.00
4 January 2024	Prepare for emergency court hearing (0.5); attend emergency hearing (0.5); review and revise objections filed by opposing counsel (0.4); multiple emails recorder striking complaint (0.3).	C Koster	1.70	2,924.00
4 January 2024	Prepare for hearing re: motion to strike (3.2); attend argument re: same (3.3).	S Hershey	6.50	10,400.00
4 January 2024	Review, revise fee motion.	B Lingle	2.90	3,364.00
4 January 2024	Draft amended motion to dismiss (3.8); implement research riders into same (1.2); draft case strategy for litigation team (0.6).	N Ash	5.60	6,216.00
4 January 2024	Revise hearing prep materials re: motion to strike (1.6); review relevant motion to dismiss materials to prepare for conference (0.6); conference with E.	L Curtis	8.50	9,435.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Levine re: motion to dismiss (0.3); conference with E. Levine, A. Branson, and others re: same (0.4); revise same (0.6); revise hearing prep materials re: motion to strike (0.8); conference with S. Hershey and E. Levine re: same (0.3); draft correspondence to S. Hershey re: same (1.7); review and revise hearing materials for S. Hershey (0.5); conference with S. Hershey, E. Levine, and others re: same (0.3); draft correspondence to S. Hershey re: same (0.1); draft proposed order re: same (1.3).			
4 January 2024	Strategy call with L. Curtis, A. Branson, and others re: amended motion to dismiss (1.7); draft amended motion to dismiss research (1.8); research re: motion for sanctions (0.3); meet with S. Hershey re: hearing on motion to strike (1.6); call with S. Hershey, L. Curtis, and others to discuss next steps (0.5); meet with W&C bankruptcy team re: same (0.2).	E Levine	6.10	6,222.00
4 January 2024	Draft motion for damages under sections 362(k) and 105(a).	A Aquije	0.80	720.00
4 January 2024	Call with E. Levine, L. Curtis, T. Haywood, and others (W&C) re: motion to dismiss draft (0.5); draft motion to dismiss (3.0); legal research re: constructive trust (1.5); attend hearing re: motion to strike (0.6); call with S. Hershey, L. Curtis, E. Levine re: next steps (0.5).	A Branson	6.10	5,490.00
4 January 2024	Research re: motion to dismiss (1.8); research re: local rules (0.4); call with E. Levine, L. Curtis, A. Branson, and A. Hovsepian re: motion to dismiss (0.4). research re: same (2.5); call with E. Levine, L. Curtis, A. Branson, and S. Hershey re: hearing on motion to strike (0.3).	T Heywood	5.40	4,293.00
4 January 2024	Prepare e-file transcript order form for 1/04 status conference (0.1); correspond with E. Levine re: same (0.1); update adversary proceeding pleadings file (0.1).	A Venes	0.30	135.00
5 January 2024	Review and edit proposed order (0.3); review term sheet (0.3); email correspondence with internal W&C team internal re: case strategy (0.3).	C Koster	0.90	1,548.00
5 January 2024	Correspond with R. Bouley, H. Stamy, and L. Curtis re: next steps in litigation (0.8); review and revise proposed order (0.5); review and revise letter re: second amended complaint (3.1).	S Hershey	4.40	7,040.00
5 January 2024	Draft proposed order re: motion to strike (0.8); review and draft correspondence to S. Hershey re: procedure research (1.1); continue to draft proposed order re: motion to strike (0.2); conference with S. Hershey re: same (0.1); draft proposed order re: same (1.0); conference with S. Hershey and others re: same (0.5); conference with E. Levine and others re: same (0.4); incorporate edits into same (0.6); revise same (0.4); draft correspondence to S. Hershey re: same (0.4); revise correspondence to counsel re: same (1.1); correspondence to S. Hershey re: same (0.3).	L Curtis	6.90	7,659.00

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WHITE & CASE

USI	HOURS	TIMEKEEPER	DESCRIPTION	DATE
3,570.0	3.50	E Levine	Draft letter re: amended complaint (2.5); calls re: strategy for amended complaint (1.0).	5 January 2024
1,260.0	1.40	A Branson	Call with W&C litigation team and advisors re: case strategy (0.5); call with S. Hershey, L. Curtis, and E. Levine re: proposed order and next steps (0.5); review draft letter to opposing counsel (0.4).	5 January 2024
3,180.0	4.00	T Heywood	Research re: leave to amend (2.3); call with R. Bouley, S. Hershey, A Branson, L. Curtis, H. Stamey, H. Hatfield, E. Levine, and C. Brown re: strategy post motion to strike hearing (0.5); call with S. Hershey, L. Curtis, A. Branson, and E. Levine re: strategy post motion to strike hearing (0.3); draft re: letter to opposing counsel (0.9).	5 January 2024
315.0	0.70	A Venes	Telephone call with Access Transcripts re: 01/04 transcript order request (0.1); correspond with E. Levine re: same (0.1); review adversary case docket re: recent docket activity (0.1); correspond with E. Levine re: transcript order (0.1); review email from Access Transcripts re: transcript order (0.1); correspond with E. Levine re: calendar update (0.1); correspond with L. Curtis re: assistance with potential filing (0.1).	5 January 2024
1,260.0	2.80	K Wick	Update court filings folders.	5 January 2024
1,032.0	0.60	C Koster	Review and edit letter re: amended complaint (0.3); telephone conference with S. Hershey re: same (0.3).	6 January 2024
999.0	0.90	L Curtis	Revise correspondence to counsel (0.6); continue revising correspondence to counsel (0.2); draft correspondence to S. Hershey re: same (0.1).	6 January 2024
204.0	0.20	E Levine	Email correspondence with co-defendants.	6 January 2024
1,530.0	1.70	A Aquije	Draft motion for damages under 362(k) and 105(a).	6 January 2024
555.0	0.50	L Curtis	Draft correspondence to S. Hershey and others re: meet and confer.	7 January 2024
510.0	0.50	E Levine	Meeting with internal W&C team re: notice of January 22, 2024 hearing.	7 January 2024
2,160.0	2.40	A Aquije	Draft motion for damages under section 362(k) and 105(a).	7 January 2024
1,376.0	0.80	C Koster	Telephone conference with internal W&C team re: motions and replies (0.4); email correspondence with Huron (0.2); review notice of hearing (0.2).	8 January 2024
1,280.0	0.80	S Hershey	Correspond with D. Geoghan, C. Koster and L. Curtis re litigation (0.5); review and revise notice re: order (0.3).	8 January 2024
2,664.0	2.40	L Curtis	Conference with S. Hershey, E. Levine, and others re:	8 January 2024

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	meet and confer (0.2); conference with S. Hershey, E. Levine, and others re: same (0.7); review and revise proposed order re: motion to strike (0.4); draft correspondence to E. Levine, A. Branson, and others re: litigation strategy (0.4); draft correspondence to A. Branson re: same (0.3); draft correspondence to A. Venes re: proposed order (0.4).			
8 January 2024	Draft, revise notice of hearing (0.5); call with Cole Schotz, S. Hershey, C. Koster, L. Curtis, and others remotions to enforce and extend (0.5).	E Levine	1.00	1,020.00
8 January 2024	Call with S. Hershey, L. Curtis, and E. Levine re: meet & confer and next steps (0.5); legal research re: Rule 11 and Rule 2004 (1.6).	A Branson	2.10	1,890.00
8 January 2024	Meeting with L. Curtis, E. Levine, A. Branson, S. Hershey, and C. Koster re: amended complaint.	T Heywood	0.70	556.50
8 January 2024	Review draft motion for fees (0.3); revise same (0.3).	C Simkins	0.60	477.00
8 January 2024	Review and save copy of 1/04 emergency hearing transcript received from Access Transcripts (0.1); assist W&C team with e-filing of proposed order on motion to strike and motion to seal (0.2); email correspondence with W&C team re: same (0.1); assist W&C team with e-filing notice of hearing in main case docket (0.1); update CompuLaw calendar (0.1); review recent activity in main case docket (0.1); update main case pleadings files (0.3).	A Venes	1.00	450.00
8 January 2024	Update court filings folders.	K Wick	1.30	585.00
9 January 2024	Review, revise fee motion.	B Lingle	2.30	2,668.00
9 January 2024	Draft correspondence to S. Hershey re: motion for fees (0.1); draft correspondence to E. Levine and others re: same (0.3); draft correspondence to C. Simkins re: same (0.1).	L Curtis	0.50	555.00
9 January 2024	Review and revise draft motion for damages.	A Aquije	0.50	450.00
9 January 2024	Research re: fee motion drafts (1.6); draft same (3.7).	C Simkins	5.30	4,213.50
9 January 2024	Update court filings folders.	K Wick	1.40	630.00
10 January 2024	Telephone S. Hershey re: motion for fees.	C Koster	0.20	344.00
10 January 2024	Review and revise motion for fees (2.0); correspond with L. Curtis, B. Lingle, and C. Koster re: same (0.6).	S Hershey	2.60	4,160.00
10 January 2024	Telephone conference with S. Hershey, W&C team re: adversary proceeding strategy.	B Lingle	0.20	232.00
10 January 2024	Review motion for fees in preparation for conference (0.4); conference with S. Hershey, B. Lingle, and	L Curtis	0.60	666.00
-	Update court filings folders. Telephone S. Hershey re: motion for fees. Review and revise motion for fees (2.0); correspond with L. Curtis, B. Lingle, and C. Koster re: same (0.6). Telephone conference with S. Hershey, W&C team re: adversary proceeding strategy. Review motion for fees in preparation for conference	K Wick C Koster S Hershey B Lingle	1.40 0.20 2.60 0.20	

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	others re: same (0.2).			
10 January 2024	Review internal W&C team correspondence (0.2); review motion to strike (0.8); review hearing transcript on motion to strike (0.6).	K Gundersen	1.60	1,632.00
10 January 2024	Draft motion to extend the stay reply (1.6); call with internal W&C team re: motion for attorneys fees (0.5).	E Levine	2.10	2,142.00
10 January 2024	Meeting with W&C team re: motion for damages.	A Aquije	0.20	180.00
10 January 2024	Conference call with S. Hershey and others (W&C) recase strategy.	C Simkins	0.20	159.00
10 January 2024	Update court filings folders.	K Wick	1.20	540.00
11 January 2024	Review objection to motion to enforce stay (0.9); multiple telephone calls with S. Hershey re: response (0.5).	C Koster	1.40	2,408.00
11 January 2024	Review objection to stay enforcement motion (1.2); correspond with L. Curtis and C. Koster re: same (1.2).	S Hershey	2.40	3,840.00
11 January 2024	Review, revise notice of withdrawal.	B Lingle	0.30	348.00
11 January 2024	Review plaintiff's objection to motion to enforce (0.9); conference with S. Hershey re: same (0.7); draft reply to same (0.3); conference with S. Hershey re: same (0.1); conference with S. Hershey re: same (0.1); continue to draft same (0.1); conference with E. Levine, A. Branson, and others re: same (0.3); continue to draft same (0.6); draft correspondence to S. Hershey re: same (0.3); continue to draft same (2.2); continue to draft same (1.2); conference with S. Hershey re: same (0.4); continue to draft same (0.1); conference with T. Heywood re: same (0.2); conference with G. Sutherland re: same (0.2); continue to draft same (1.2).	L Curtis	9.00	9,990.00
11 January 2024	Call with L. Curtis to discuss motion to enforce reply (0.3); review team research and correspondence (0.3).	K Gundersen	0.60	612.00
11 January 2024	Legal research re: motion to strike (2.0); draft same (2.0); draft notice of withdrawal (0.9); call with L. Curtis, C. Simkins, A. Branson, and others re: strategy for motion to strike (0.3).	E Levine	5.20	5,304.00
11 January 2024	Review response to motion to enforce.	A Aquije	0.10	90.00
11 January 2024	Meet with L. Curtis, E. Levine, and others (W&C) re: response to motion to enforce (0.4); review same (0.6).	A Branson	1.00	900.00
11 January 2024	Research re: 5th Circuit argument and concession issues (2.8); email correspondence re: same (1.0).	G Sutherland	3.80	3,420.00
11 January 2024	Research re: judicial estoppel.	T Heywood	2.80	2,226.00

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3,657.00	4.60	C Simkins	Research re: motion to enforce (4.3); conference call with L. Curtis and others (W&C) re: case strategy (0.3).	11 January 2024
45.00	0.10	A Venes	Review recent activity in adversary proceeding docket and update adversary proceeding pleadings files.	11 January 2024
675.00	1.50	K Wick	Update court filings folders.	11 January 2024
1,892.00	1.10	C Koster	Telephone S. Hershey re: stay motions (0.4); telephone Orrick re: same (0.4); email correspondences re: same (0.3).	12 January 2024
4,640.00	2.90	S Hershey	Correspond with C. Koster, M. Franke, and L. Curtis re: motion to enforce and motion to extend (0.9); review and revise motion to strike (2.0).	12 January 2024
464.00	0.40	B Lingle	Telephone conference and correspond with counsel to ASF re: adversary.	12 January 2024
2,553.00	2.30	L Curtis	Draft reply to plaintiff's objection to motion to enforce (0.6); attend meet and confer re: same (0.4); draft correspondence to E. Levine re: same (0.2); draft correspondence to G. Sutherland re: same (0.2); analyze draft resolution re: same (0.9).	12 January 2024
7,446.00	7.30	K Gundersen	Research re: law of the case doctrine (2.3); draft summary of research findings (2.3); research re: estoppel (2.2); review research findings (0.5).	12 January 2024
4,488.00	4.40	E Levine	Draft stipulation (2.0); call with S. Hershey, L. Curtis, and Orrick team (0.8); legal research re: motion to strike (0.8); draft same (0.8).	12 January 2024
270.00	0.30	A Aquije	Legal research re: law of the case doctrine.	12 January 2024
1,080.00	1.20	A Branson	Legal research re: estoppel issues.	12 January 2024
2,250.00	2.50	G Sutherland	Research re: 5th Circuit argument and concession issues (1.9); email correspondence re: same (0.3); email correspondence with L. Curtis re: legal concession issues (0.3).	12 January 2024
2,067.00	2.60	T Heywood	Research re: judicial estoppel.	12 January 2024
45.00	0.10	A Venes	Review recent activity in adversary proceeding docket.	12 January 2024
2,236.00	1.30	C Koster	Telephone conference with Huron re: motion to extend stay (0.8); review objection to motion to extend (0.5).	13 January 2024
2,400.00	1.50	S Hershey	Correspond with L. Curtis, R. Bouley, and C. Koster re: motion to extend and motion to enforce.	13 January 2024
348.00	0.30	B Lingle	Telephone conference with E. Levine re: reply in support of motion to extend, declaration.	13 January 2024
11,433.00	10.30	L Curtis	Review legal research re: plaintiff's objection to motion	13 January 2024

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	to enforce (0.7); conference with A. Branson re: same (0.3); continue analyzing legal research re: same (1.0); conference with S. Hershey and others re: same (0.8); conference with S. Hershey re: same (0.2); draft reply to same (0.6); draft correspondence re: same (0.5); continue to draft reply to same (3.4); conference with S. Hershey and E. Levine re: motion to extend reply (0.3); continue to draft reply to plaintiff's objection to motion to enforce (2.5).			
13 January 2024	Review opposition to motion to extend (0.8); call with S. Hershey and L. Curtis re: strategy for reply motion (0.3); call with B. Lingle re: same (0.3).	E Levine	1.40	1,428.00
13 January 2024	Legal research re: appeals issues.	A Branson	1.90	1,710.00
13 January 2024	Legal research re: motion to enforce (3.1); email correspondence re: same (0.5); email correspondence re: motion to enforce research (0.8).	G Sutherland	4.40	3,960.00
13 January 2024	Research re: motion withdrawal.	T Heywood	3.20	2,544.00
14 January 2024	Review objection to motion to extend (0.3); email correspondence with Orrick (0.2).	C Koster	0.50	860.00
14 January 2024	Draft Bouley declaration in support of motion to extend.	B Lingle	2.00	2,320.00
14 January 2024	Review and follow up re: motion to extend and motion to enforce research (1.6); review research re: property of the estate (0.9); review objections re: motion to extend and motion to enforce (0.8).	N Ash	3.30	3,663.00
14 January 2024	Draft reply re: plaintiff's objection to motion to enforce (0.8); draft correspondence to T. Heywood re: same (0.3); continue to draft reply to same (2.1); conference with B. Lingle re: same (0.1); continue to draft reply to same (3.5); revise same (0.5).	L Curtis	7.30	8,103.00
14 January 2024	Draft motion to extend reply (2.3); research: same (2.3).	E Levine	4.60	4,692.00
14 January 2024	Legal research re: motion to enforce (1.1); draft memo for W&C team re: same (1.2); legal research re: executory contracts (1.8); legal research re: property of the estate (3.0).	A Aquije	7.10	6,390.00
14 January 2024	Legal research re: executory contracts (2.1); draft reply in support of motion to extend re: same (1.0).	A Branson	3.10	2,790.00
14 January 2024	Legal research re: D&O proceeds.	G Sutherland	5.10	4,590.00
14 January 2024	Research re: motion withdrawal.	T Heywood	5.30	4,213.50
14 January 2024	Research re: motion to enforce (2.5); correspond with G. Sutherland re: workstreams for research in connection with motion to extend (0.2); research re:	C Simkins	5.80	4,611.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	same (2.0); research re: objection to motion to extend (1.1).			
15 January 2024	Review term sheets (0.4); email correspondence with Orrick (0.2); review preliminary reply re: stay motion (0.4); email correspondence with Huron (0.2).	C Koster	1.20	2,064.00
15 January 2024	Correspond with W&C team re: settlement issues.	G Pesce	0.40	688.00
15 January 2024	Review and revise reply re: motion to enforce.	S Hershey	7.00	11,200.00
15 January 2024	Draft motion to extend (2.1); draft Bouley Declaration in support of same (2.2).	B Lingle	4.30	4,988.00
15 January 2024	Review, edit, and redraft Bouley declaration (1.9); review and edit draft of motion to enforce reply (0.8); review and edit draft of motion extend shell (0.9); telephone call with L. Curtis and E. Levine re: upcoming filings (0.5); draft instructions for team re: outstanding workstreams (0.3); review filings (0.3); draft fees section rider for motion to enforce reply (3.5).	N Ash	8.20	9,102.00
15 January 2024	Draft correspondence to S. Hershey re: motion to enforce reply (0.8); conference with N. Ash and E. Levine re: same (0.5); conference with N. Ash re: same (0.2); revise same (1.1); continue revising same (0.3).	L Curtis	2.90	3,219.00
15 January 2024	Draft declaration (1.0); draft motion to extend (3.7) legal research re: same (3.8); call with L. Curtis and N. Ash re: motion to enforce and motion to extend (0.5).	E Levine	9.00	9,180.00
15 January 2024	Legal research re: property of the estate (1.0); draft internal memo for W&C team re: same (1.2); review underlying debtor-director indemnification agreements (1.0); review and revise declaration in support of motion to extend (0.7).	A Aquije	3.90	3,510.00
15 January 2024	Legal research re: motions for reconsideration (1.5); review and revise declaration in support of motion to extend (1.4).	A Branson	2.90	2,610.00
15 January 2024	Draft language for reply re: D&O proceeds.	G Sutherland	1.30	1,170.00
15 January 2024	Research re: motion to extend.	T Heywood	2.60	2,067.00
15 January 2024	Research re: objection to motion to extend.	C Simkins	2.50	1,987.50
16 January 2024	Review and edit preliminary reply re: stay motion (0.3); multiple email correspondences with Huron and Porter Hedges re: same (0.2); review term sheet (0.3).	C Koster	0.80	1,376.00
16 January 2024	Correspond with W&C team re: settlement issues.	G Pesce	0.40	688.00
16 January 2024	Review and revise motion to extend reply declaration	S Hershey	3.30	5,280.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.5); review and revise reply re: motion to enforce (1.8); review and revise reply re: motion to extend (1.0).			
16 January 2024	Telephone conference with W&C team re: replies (1.5); review, revise Bouley Declaration in support of motion to extend (1.5).	B Lingle	3.00	3,480.00
16 January 2024	Review and edit motion to extend (2.6); review and revise rider re: motion for damages (1.1); draft same (1.2); attend motion to enforce call with S. Hershey (0.3); attend and lead litigation team call and follow up (0.8); prepare for litigation team call (0.3); review and implement S. Hershey edits into motion to enforce (1.2); revise motion to enforce (1.4); review same (1.2); review filing re: same (2.7).	N Ash	12.80	14,208.00
16 January 2024	Conference with N. Ash, E. Levine, and others re: litigation strategy (0.4); Conference with N. Ash, E. Levine, and others re: motion to extend reply (0.3); draft same (1.9); revise motion to enforce reply (0.7); continue revising same (0.6); conference with S. Hershey re: same (0.1); draft correspondence to N. Ash and T. Heywood re: same (0.3); conference with S. Hershey re: same (0.1); conference with N. Ash re: same (0.1); draft correspondence to S. Hershey re: same (0.1); review and revise same (1.5).	L Curtis	6.10	6,771.00
16 January 2024	Meet with N. Ash, L. Curtis, and associate team to discuss filings (0.5); meet with S. Hershey and full team to discuss replies to motion objections (0.5); review motion to extend objection and counsel correspondence (0.8); research re: motion to extend reply (1.7); draft argument re: same (1.8).	K Gundersen	5.30	5,406.00
16 January 2024	Calls with B. Lingle, L. Curtis, N. Ash regarding motion to extend; (0.5); call with S. Hershey, L. Curtis, and N. Ash re: same (0.5); draft motion to extend (3.3); legal research re: same (3.4).	E Levine	7.70	7,854.00
16 January 2024	Team meeting with W&C to discuss workstreams remotion to enforce (0.4); review and revise declaration in support of motion to extend (1.9).	A Aquije	2.30	2,070.00
16 January 2024	Call with N. Ash, L. Curtis, and others (W&C) re: filings and case status (0.4); call with S. Hershey, N. Ash, L. Curtis, and others (W&C) re: same (0.4); cite-check re: reply in support of motion to enforce (2.8); legal research re: section 362 (1.2).	A Branson	4.80	4,320.00
16 January 2024	Call with W&C team re: workstreams and next steps (0.4); draft language for reply re: D&O proceeds (0.4); revise Bouley declaration (0.4); email correspondence with A. Aquije re: Bouley declaration (0.2).	G Sutherland	1.40	1,260.00
16 January 2024	Call with A. Branson, N. Ash, A. Aquije, C. Simkins, K. Gunderson, B. Lingle, L. Curtis, G. Sutherland, and E. Levine re: motion to extend and motion to enforce (0.4); call with N. Ash, A Branson, K. Gunderson, E.	T Heywood	4.40	3,498.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Levine, L. Curtis, and S. Hershey re: case strategy (0.4); cite check motion to extend (3.6).			
16 January 2024	Research re: objection to the motion to extend (1.0); meet with W&C team re: objection to motion to extend (0.4); review reply to objection to motion to enforce (0.3).	C Simkins	1.70	1,351.50
16 January 2024	Email correspondence with W&C team re: preliminary reply to objection to motion to enforce and upcoming filing of same (0.2); finalize exhibit to preliminary reply (0.1); assist with e-filing and service of preliminary reply (4.1).	A Venes	4.40	1,980.00
16 January 2024	Update court filings folders.	K Wick	0.80	360.00
17 January 2024	Review and edit reply re: stay extension motion (0.3); telephone Porter Hedges re: settlement (0.4).	C Koster	0.70	1,204.00
17 January 2024	Correspond with W&C team re: settlement issues.	G Pesce	0.40	688.00
17 January 2024	Correspond with E. Levine, N. Ash, and R. Bouley re: motion to extend reply (0.8); correspond with H. Stamey and R. Bouley re: settlement (0.4); review and revise motion to extend reply (1.5).	S Hershey	2.70	4,320.00
17 January 2024	Telephone conference with W&C team, R. Bouley re: declaration (0.4); review, revise same (1.4).	B Lingle	1.80	2,088.00
17 January 2024	Attend call with Huron re: declaration draft for motion to extend (0.3); draft motion to extend (1.4); attend settlement update call (0.3); attend call with S. Hershey re: settlement update (0.2); review updated motion to extend draft (0.7); review motion to extend reply filing (0.6); review and implement edits to Bouley declaration (0.7); review final draft of motion to extend reply (0.9).	N Ash	5.10	5,661.00
17 January 2024	Conference with N. Ash, E. Levine, and others re: motion to extend reply.	L Curtis	0.30	333.00
17 January 2024	Review as-filed version of motion to enforce reply (1.0); review draft of motion to extend reply and S. Hershey comments (1.2).	K Gundersen	2.20	2,244.00
17 January 2024	Prepare draft motion to extend automatic stay.	E Levine	7.30	7,446.00
17 January 2024	Meeting with W&C team and Huron to discuss declaration in support of motion to extend the stay (0.3); review and revise declaration in support of motion to extend the stay (1.2).	A Aquije	1.50	1,350.00
17 January 2024	Draft witness and exhibit list for court hearing (1.3); review and revise motion to extend (1.5).	A Branson	2.80	2,520.00
17 January 2024	Review plan and disclosure statement.	G Sutherland	0.10	90.00

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318.0	0.40	T Heywood	Research re: motion to extend.	17 January 2024
397.5	0.50	C Simkins	Pull and review pleadings for reply re: motion to extend.	17 January 2024
2,236.0	1.30	C Koster	Review and edit reply re: stay extension motion (0.5); email with internal W&C team re: same (0.3); review sur-reply (0.3); email correspondence with court chambers (0.2).	18 January 2024
688.0	0.40	G Pesce	Correspond with W&C team re: settlement issues.	18 January 2024
5,120.0	3.20	S Hershey	Review and revise witness and exhibit list (0.5); review and revise motion to extend reply (1.8); review surreply (0.6); correspond with M. Franke re: settlement (0.3).	18 January 2024
6,993.0	6.30	N Ash	Conduct motion to extend reply cite check (1.0); review and revise same (0.9); implement R. Bouley edits into supporting declaration (1.1); correspond with Huron re: director and officer insurance (0.4); correspond with A. Venes re: filings (0.5); review witness and exhibit list for final checks (0.4); review sur-reply from opposing counsel (0.8); review surreply to prepare for hearing prep (0.9); discuss surreply with L. Curtis and S. Hershey (0.3).	18 January 2024
1,887.0	1.70	L Curtis	Review plaintiff's surreply to motion to enforce (0.4); conference with N. Ash and S. Hershey re: same (0.3); draft correspondence to S. Hershey and others re: same (1.0).	18 January 2024
3,876.0	3.80	E Levine	Draft and file motion to extend automatic stay.	18 January 2024
90.0	0.10	A Aquije	Review and revise declaration in support of motion to extend.	18 January 2024
2,610.0	2.90	A Branson	Cite-check re: motion to extend automatic stay.	18 January 2024
1,669.5	2.10	T Heywood	Cite check re: motion to extend.	18 January 2024
1,755.0	3.90	A Venes	Email correspondence with W&C team re: assistance with finalizing reply in support of motion to extend (1.1); email correspondence with W&C team re: declaration in support of motion to extend (1.0); email correspondence with W&C team re: witness and exhibit list for reply in support of motion to extend (1.0); finalize, e-file, and electronically serve same documents related to reply in support of motion to extend (0.5); download, save and distribute copies of filings to team (0.2); update internal pleadings files (0.1).	18 January 2024
225.0	0.50	K Wick	Update court filings folders.	18 January 2024
1,720.0	1.00	C Koster	Prepare for hearing (0.3); telephone S. Hershey re: hearing agenda (0.2); review settlement (0.2); email	19 January 2024

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	correspondence with Porter Hedges and Huron re: same (0.1); review proposed agreed order (0.2).			
19 January 2024	Correspond with W&C team re: settlement issues, stay enforcement order, and related items.	G Pesce	0.40	688.00
19 January 2024	Review and revise agenda (0.4); review and revise proposed order (0.6); correspond with M. Franke resame (0.3).	S Hershey	1.30	2,080.00
19 January 2024	Review correspondence re motion to extend.	B Lingle	0.20	232.00
19 January 2024	Review motion to extend case law research (2.3); review proposed hearing agenda (0.4); review and edit joint proposed order (0.6); correspond with K. Wick re: hearing prep materials (0.5).	N Ash	3.80	4,218.00
19 January 2024	Review briefing to prepare for hearing.	L Curtis	0.30	333.00
19 January 2024	Draft proposed order re: motion to extend automatic stay (2.0); review and revise same (0.7).	A Branson	2.70	2,430.00
19 January 2024	Review recent activity in main case docket and adversary proceeding (0.1); update main case and adversary proceeding pleadings files (0.2).	A Venes	0.30	135.00
19 January 2024	Pull cases for N. Ash.	K Wick	0.60	270.00
20 January 2024	Email correspondence with Orrick re: motion to extend order (0.4); prepare for hearing (0.4).	C Koster	0.80	1,376.00
20 January 2024	Correspond with W&C team re: settlement issues.	G Pesce	0.60	1,032.00
20 January 2024	Review and respond to email from S. Hershey re: assistance with e-filing of proposed orders (0.1); e-file proposed order in the main case and adversary proceeding (0.2); download, save and distribute filed versions to team (0.2).	A Venes	0.50	225.00
21 January 2024	Prepare for hearing.	C Koster	0.50	860.00
21 January 2024	Correspond with W&C team re: settlement issues, stay enforcement order, and related items.	G Pesce	0.50	860.00
22 January 2024	Prepare for hearing (0.5); attend hearing (0.7).	C Koster	1.20	2,064.00
22 January 2024	Correspond re: status and next steps.	G Pesce	0.30	516.00
22 January 2024	Attend hearing re: adversary and correspond with C. Koster and G. Pesce re: same.	S Hershey	0.50	800.00
23 January 2024	Correspond re: status and next steps.	G Pesce	0.30	516.00
23 January 2024	Update court filings folders.	K Wick	1.60	720.00

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ATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
January 2024	Update court filings folders.	K Wick	1.40	630.00
January 2024	Update court filings folder.	K Wick	1.80	810.00
January 2024	Correspond re: status and next steps.	G Pesce	0.30	516.00
January 2024	Correspond with B. Wicker, C. Koster, G. Pesce, R. Bouley and E. English re: plan release litigation.	S Hershey	1.10	1,760.00
January 2024	Update court filings folders.	K Wick	1.30	585.00
January 2024	Correspond re: status and next steps.	G Pesce	0.30	516.00
January 2024	Review D&O policies (1.8); confer with S. Hershey re same (0.5).	R Gorsich	2.30	3,680.00
January 2024	Correspond re: status and settlement issues.	G Pesce	0.30	516.00
January 2024	Correspond re: status and settlement issues.	G Pesce	0.30	516.00
JBTOTAL: Adversary	Proceeding		601.80	628,477.00
etention/Fees				
January 2024	Attention to retention objection.	C Koster	0.60	1,032.00
January 2024	Continue to draft November fee statement (0.3); review status of retention order and November fee application (0.1); email with partners re: same (0.1); draft November fee statement (0.1).	S Ludovici	0.60	828.00
January 2024	Correspond with W&C team re: W&C retention application.	B Lingle	0.40	464.00
January 2024	Review objection to retention (0.6); correspond with G. Pesce, C. Koster, and others re: same (0.3); research re: same (0.4); email with G. Pesce and C. Koster re: retention order (0.1).	S Ludovici	1.40	1,932.00
January 2024	Revise monthly fee application.	A Aquije	0.40	360.00
January 2024	Telephone internal W&C team re: retention objection.	C Koster	0.40	688.00
January 2024	Review pro forma time entries or expense entries for December monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.6); prepare for call with G. Pesce, C. Koster, and others re: strategy for objection to retention (0.1); attend call re: same (0.3); research re: section 328 (0.4); research re: retention objection (0.3); email with A. Aquije re: draft interim fee application (0.1).	S Ludovici	1.80	2,484.00
January 2024	Telephone conference with W&C bankruptcy team re: reply in support of W&C retention application.	B Lingle	0.30	348.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
4 January 2024	Call with W&C team re: response to retention application objection (0.3); follow up with B. Lingle and S. Ludovici re: same (0.1).	A Aquije	0.40	360.00
5 January 2024	Draft reply to retention objection (1.7); emails with B. Lingle and A. Aquije re: draft response (0.1).	S Ludovici	1.80	2,484.00
5 January 2024	Correspond with W&C team re: reply in support of W&C retention application.	B Lingle	0.30	348.00
5 January 2024	Review pro forma time entries for fee application for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	A Aquije	1.40	1,260.00
6 January 2024	Review and revise reply in support of W&C retention (0.8); research re: same (0.8).	A Aquije	1.60	1,440.00
8 January 2024	Revise reply in support of retention (0.2); email with A. Alonso and B. Lingle re: response (0.1).	S Ludovici	0.30	414.00
8 January 2024	Review, revise reply in support of W&C retention.	B Lingle	0.80	928.00
8 January 2024	Revise response in support of retention application.	A Aquije	0.70	630.00
9 January 2024	Review and edit reply in support of retention application (1.1); email correspondence with Huron re: approach (0.3).	C Koster	1.40	2,408.00
9 January 2024	Review draft response and further objections (0.3); review pro forma time entries or expense entries for December monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.2); review revised reply (0.2); email with C. Simkins re: fee calculation (0.1).	S Ludovici	0.80	1,104.00
9 January 2024	Revise reply in support of W&C retention application.	B Lingle	1.10	1,276.00
10 January 2024	Review and edit reply in support of retention application (0.6); review amended retention declaration (0.3).	C Koster	0.90	1,548.00
10 January 2024	Draft supplemental declaration (0.5); email with G. Pesce re: same (0.1); further revise declaration (0.4); revise Pesce declaration (0.1); review filing of Pesce declaration and objection reply (0.2); review pro forma time entries or expense entries for December monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.2); review revised reply in support of retention (0.1).	S Ludovici	1.60	2,208.00
10 January 2024	Revise W&C retention reply and revised form of order.	B Lingle	0.60	696.00
10 January 2024	Review and revise draft reply in support of retention (0.5); draft revised order authorizing retention (0.5).	A Aquije	1.00	900.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 January 2024	Review and respond to emails with G. Pesce, C. Koster, S. Hershey, B. Lingle, S. Ludovici, and A. Aquije re: upcoming filing of G. Pesce's second declaration in support of the W&C retention application (0.3); finalize and file same (0.1); review and respond to various emails with W&C team re: reply in support of W&C retention application (0.3); assist with finalizing and filing same (0.5).	D Hirshorn	1.20	540.00
11 January 2024	Email with G. Pesce re: December fee statement (0.1); email with G. Pesce re: fees (0.1).	S Ludovici	0.20	276.00
17 January 2024	Multiple telephone calls with Bank7 re: resolution of retention objection.	C Koster	0.40	688.00
18 January 2024	Email with A. Aquije re: interim fee application.	S Ludovici	0.10	138.00
18 January 2024	Draft first interim fee application for W&C.	A Aquije	1.60	1,440.00
19 January 2024	Review and revise draft first interim fee application.	S Ludovici	0.40	552.00
22 January 2024	Attention to fee statements.	C Koster	0.30	516.00
22 January 2024	Draft November fee statement (0.4); emails re: December fee statement (0.1); review pro forma time entries or expense entries for January monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.3); email with staff re: December (0.1); emails with C. Koster and G. Pesce re: fee applications (0.1).	S Ludovici	1.00	1,380.00
22 January 2024	Hearing re: motion to extend and W&C retention application.	B Lingle	0.40	464.00
22 January 2024	Review pro forma time entries for fee application for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	A Aquije	1.40	1,260.00
23 January 2024	Attention to fee application.	C Koster	0.30	516.00
23 January 2024	Revise monthly fee statement.	S Ludovici	0.30	414.00
24 January 2024	Review pro forma time entries or expense entries for Nov-declaration monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (1.2); revise second interim fee application (0.6); emails with G. Pesce and C. Koster re: filing monthly fee statement (0.1); email with B. Ruzinsky re: same (0.1); revise monthly fee application (0.2).	S Ludovici	2.20	3,036.00
24 January 2024	Review various emails re: upcoming filing of W&C first monthly fee statement (0.1); file W&C first monthly fee statement (0.1); email S. Ludovici re: same (0.1).	D Hirshorn	0.30	135.00
25 January 2024	Review filed monthly fee application.	S Ludovici	0.30	414.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
25 January 2024	Review pro forma time entries for fee application for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	A Aquije	1.00	900.00
27 January 2024	Review plan confirmation matters.	C Koster	0.60	1,032.00
28 January 2024	Review pro forma time entries or expense entries for December monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	A Aquije	0.70	630.00
30 January 2024	Review pro forma time entries or expense entries for January monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (1.1); email with A. Aquije re: January (0.1).	S Ludovici	1.20	1,656.00
SUBTOTAL: Retention/Fees			34.50	42,127.00
TOTAL			636.30	670,604.00

Exhibit D

Expense Summary & Detail

Category	Amount
Court Costs	\$160.60
Overtime Meals	\$67.36
Taxi - Overtime	\$31.76
Grand Total	\$259.72

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Date	Timekeeper	English Narrative	Category	Amount
1/10/2024	Levine, Esther	Court costs - Transcript expense incurred for transcription services for a matter 05-Jan-24	Court Costs	146.00
1/10/2024	Levine, Esther	Court costs - Transcript expense incurred for transcription services for a matter 06-Jan-24	Court Costs	14.60
1/10/2024	Levine, Esther	01/03/2024 Invoice#HJM4J5-111- Meal Order#526424855915260 My Thai Vegan Cafe - Esther Kozakevich	Overtime Meals	30.61
1/22/2024	Levine, Esther	Overtime Transportation - Taxi expense incurred for working late in the office for a matter 03-Jan-24	Taxi - Overtime	14.55
1/23/2024	Levine, Esther	Overtime Transportation - Taxi expense incurred for working late in the office for a matter 17-Jan-24	Taxi - Overtime	17.21
1/23/2024	Levine, Esther	01/17/2024 Invoice#HJM4J5-113- Meal Order# 553124990707413 My Thai Vegan Cafe (in office for filing motion) - Esther Kozakevich	Overtime Meals	36.75
				<u>259.72</u>